

July 20, 2015

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: ***Special Access for Price Cap Local Exchange Carriers, WC Dkt. No. 05-25;  
AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local  
Exchange Carrier Rates for Interstate Special Access Services, RM-10593***

Dear Ms. Dortch:

Pursuant to the procedures outlined in the *Modified Protective Order*,<sup>1</sup> *Second Protective Order*,<sup>2</sup> and *Data Collection Protective Order*,<sup>3</sup> I hereby submit Acknowledgments of Confidentiality executed by J. Scott Marcus, Dr. Thomas Pluckebaum, and Ilsa Godlovitch of WIK-Consult, outside consultants to BT Americas Inc., for purposes of accessing confidential and highly confidential information and data filed in the above-referenced proceedings, including information and data submitted in response to the Commission's special access data collection.

Please contact me at (202) 303-1161 if you have any questions regarding this submission.

Respectfully submitted,

/s/ Matthew Jones

*Counsel for BT Americas Inc.*

Attachment

cc: SpecialAccess@fcc.gov

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<sup>1</sup> *In the Matter of Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, 25 FCC Rcd. 15168 (2010) ("*Modified Protective Order*").

<sup>2</sup> *In the Matter of Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, 25 FCC Rcd. 17725 (2010) ("*Second Protective Order*").

<sup>3</sup> *In the Matter of Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Order and Data Collection Protective Order, 29 FCC Rcd. 11657 (2014) ("*Data Collection Protective Order*"); see also *Wireline Competition Bureau Now Receiving Acknowledgments of Confidentiality Pursuant to Special Access Data Collection Protective Order*, Public Notice, DA 15-736 (rel. June 24, 2015).

## APPENDIX A

## Acknowledgment of Confidentiality

WC Docket No. 05-25, RM 10593

I hereby acknowledge that I have received and read a copy of the foregoing Protective Order in the above-captioned proceedings, and I understand it. I agree that I am bound by the Protective Order and that I shall not disclose or use Stamped Confidential Documents or Confidential Information except as allowed by the Protective Order. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Protective Order is due solely to my capacity as Counsel or consultant to a party or other person described in paragraph 4 of the foregoing Protective Order and that I will not use such information in any other capacity, nor will I disclose such information except as specifically provided in the Protective Order.

I hereby certify that I am not involved in "competitive decision-making" as that term is used in the definition of In-House Counsel in paragraph 4 of the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Confidential Documents and Confidential Information are used only as provided in the Protective Order; and (2) Stamped Confidential Documents are not duplicated except as specifically permitted by the terms of the Protective Order.

I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Stamped Confidential Documents or Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed at Bad Honnef this 3rd day of July, 2015.

  
[Name] J Scott Marcus  
[Position] Consultant  
[Address] Großenbuschstr. 56, 53229 Bonn, Germany,  
[Telephone] +49 228 5349523

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[Position] Consultant  
[Address] Großenbuschstr. 56, 53229 Bonn, Germany,  
[Telephone] +49 228 5349523



## APPENDIX C

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I am seeking access to ☐ only Confidential Information or ☒ Confidential and Highly Confidential Information.

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I acknowledge that nothing in the Data Collection Protective Order limits any other rights and remedies available to a Submitting Party at law or in equity against me if I use Confidential or Highly Confidential Information in a manner not authorized by this Data Collection Protective Order.

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Executed this 09 day of July, 2015.



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[Position]	Consultant
[Firm]	Großenbuschstr. 56, 53229 Bonn, Germany
[Telephone]	+49 228 5349523

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[Name] Dr Thomas Plückebaum  
[Position] Head of Department "Cost Modelling and Internet Economics"  
[Firm] WIK-Consult, Rhöndorfer Str. 68, 53604 Bad Honnef, Germany  
[Telephone] +49 2224 9225-20



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[Name] Ilsa Godlovitch  
[Position] Director WIK-Consult Brussels Office  
[Address] Rue Auguste Beernaert 14, 1170 Brussels, Belgium  
[Telephone] +32 2 830 0380



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Executed this 19 day of July, 2015

*Ilse Godlovitch*

[Name]  
[Position]  
[Firm]  
[Telephone]

*Ilse Godlovitch*  
*Director, WIC - Consult*  
*Brussels Office*